



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street
San Francisco, CA 94105

April 18, 2017

Mr. Anthony R. Brown
Environmental Manager
Atlantic Richfield Company
4 Centerpointe Drive, LPR 4-435
La Palma, CA 90623-1066

Re: Subject: EPA comments on Atlantic Richfield (ARC) Proposed 2017 Snowmelt Runoff Monitoring program and requested Modifications to the Evaporation Pan Monitoring Program; Leviathan Mine Site, Alpine County, California, dated April 6, 2017

Dear Mr. Brown:

The U.S. Environmental Protection Agency (EPA) has reviewed the Proposed 2017 Snowmelt Runoff Monitoring and Modifications to the Evaporation Pan Monitoring Program, Leviathan Mine Site, Alpine County, California (TSAP) prepared on behalf of the Atlantic Richfield Company (ARC) by AMEC, dated April 6, 2017.

This work was submitted to EPA pursuant to Administrative Order for Remedial Investigation and Feasibility Study, Leviathan Mine, Alpine County, California (CERCLA Docket No. 2008-18, June 23, 2008).

Background: The main objectives of the snowmelt runoff monitoring program are to evaluate the interaction of snowmelt runoff with disturbed mine materials, and to evaluate sediment erosion by snowmelt runoff. To remain consistent with the storm water monitoring program, snowmelt runoff monitoring is conducted at the same locations using the same equipment as the storm water sampling. The automatic samplers at each location have been programmed to collect three, 24-hour composite, flow-proportional samples during a one-week period. The automated samplers typically collect field parameter measurements along with the water samples for laboratory analysis. In 2015, ARC proposed that storm water monitoring would continue only at Stations ST-01 and ST-04 with optional sampling at stations ST-02, ST-03, ST-05, and ST-06. The U.S. EPA agreed with this approach in its response dated March 23, 2015. On April 24, 2015, ARC's letter to EPA regarding optimization of select On-Property monitoring programs (attached) clarified that ARC will "...defer snowmelt runoff sampling and surface water sampling until average or above-average snowpack occurs...".

On March 28, 2017, EPA noted a high snowmelt runoff sampling opportunity and requested ARC implement both the snowmelt and surface water monitoring programs and provide a table of samples to be collected and a figure showing sample locations. EPA requested ARC collect samples from the 4 storm water and snowmelt locations, as well as samples from Station 17 within 14 days during peak snowmelt. In addition to the storm water and snowmelt monitoring, EPA also requested surface water

monitoring be conducted within 40 days.

On April 4, 2017, EPA followed up with an email request to complete the requested sampling. On April 4, 2017, ARC noted that samples cannot be collected until the automated sampling devices are re-installed at the designated monitoring locations. Further, ARC noted site conditions do not allow for ARC to reinstall the equipment by April 11th. On April 6, 2017, ARC provided EPA with a letter describing the Proposed 2017 Snowmelt Runoff Monitoring Program and Modifications to the Evaporation Pan Monitoring Program

EPA has completed its review and concurs that snowmelt collection at each of the four main storm water/snowmelt locations (ST-01, ST-04, ST-07, and ST-08) is sufficient, and that snowmelt samples at the four optional locations (ST-02, ST-03, ST-05, and ST-06) is not required. EPA also concurs that Station 17 (ARC location SW-16) would be redundant and can be removed from the monitoring program as long as surface water samples are collected at this location this year.

EPA approves the ARC snowmelt monitoring plan, and concurs with removal of the evaporation pan, and requests that ARC access the site and install the sampling equipment as early in April as possible.

If you have any questions, please feel free to contact me at (415) 947-4183 or Deschambault.lynda@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Lynda Deschambault". The ink is dark and the signature is fluid, with the first name "Lynda" being more prominent than the last name "Deschambault".

Lynda Deschambault
Remedial Project Manager

Cc by electronic Email:

Douglas Carey, California Regional Water Quality Control Board, Lahontan Region
Michelle Hochrein, Washoe Tribe of Nevada and California
David Friedman, Nevada Department of Environmental Protection
Kenneth Maas, United States Forest Service
Tom Maurer, United States Fish and Wildlife Service
Toby McBride, United States Fish and Wildlife Service
Steve Hampton, California Department of Fish and Wildlife
Marc Lombardi, AMEC